

**APPENDIX H:**

**ADJACENT JURISDICTION COMMENTS AND  
RESPONSES**

## City of Jordan Comprehensive Plan: Interjurisdictional Review

Notifications were sent to the following affected jurisdictions for the required comprehensive plan six-month comment period, which ran from **June 19 to December 19, 2018**. This matches the list of jurisdictions provided by the Metropolitan Council through the Local Planning Handbook website. Comments received, and responses to those comments, are attached. If no comment is provided, it is because the jurisdiction did not respond within the six-month comment period.

The following summary also includes comments and responses from the Metropolitan Council's preliminary review of the draft plan, which was initiated during the six-month review period.

Jurisdiction Type	Jurisdiction Name	Response Received?
Adjacent Community	Sand Creek Township	No
Adjacent Community	St. Lawrence Township	No
Adjacent Community	Carver County	Yes
School District	717; Jordan	No
Watershed Management Organization	Scott County Watershed Management Organization	Yes
Regional Park Implementing Agency	Scott County	Yes
State Agency	MnDNR	Yes
State Agency	MnDOT	Yes

Following the completion of the interjurisdictional review, the plan was updated based on comments received. The plan was brought before a Planning Commission public hearing on **February 12, 2019**, and a resolution for plan submittal was approved by the City Council on **February 19, 2019**. See **Appendix I** for documentation of those meetings.

## City of Jordan Comprehensive Plan Comment Tracker

*Comments received from the interjurisdictional review and Metropolitan Council informal review*

Solar and Resilience			
Incomplete Comments			
Number	Comment	From	Status
Advisory Comment			
Number	Comment	From	Status
1.	For assistance with screening which roofs are feasible for solar photo-voltaic (PV) development in the community, Council staff highly recommend utilizing Google's 'Project Sunroof' application. For the City of Jordan, the application states that there are approximately 1,500 roofs suitable for solar PV development in terms of the solar isolation potential.	Met Council	Added reference to Project Sunroof tool in text
2.	County staff applauds the City's decision to dedicate an entire chapter on Resilience and its recent designation as a GreenStep City. The County has partnered with the University of Minnesota's Resilient Communities Program in 2018/19, and if certain research projects this year can help advance the plan's goals and objectives on resiliency, county staff will reach out to city staff for potential collaboration and information-sharing.	Scott County	The plan includes a commitment to evaluate progress using GreenStep City program

Land Use			
Incomplete Comments			
Number	Comment	From	Status
1.	Maps throughout the Plan are difficult to read. Legibility of details and legends are difficult to verify as meeting minimum requirements	Met Council	Higher resolution images have been added to document. Will also include larger format maps in appendix in final version of plan.

2.	A Future Land Use table clearly calculating total acres and percent of total acres for each land use category in each 10-year planning period (2020, 2030, and 2040) must be clearly provided. While there is a great deal of interesting information shown in the Land Use Chapter tables, it's unclear how many acres for each land use category are available in each 10-year planning period. This is necessary for an appropriate land use and density analysis. The Plan does identify the land needed to accommodate forecasted growth, but it is less clear where or when that land is planned to develop or at which densities it is planned to develop. Please clarify, perhaps in tables 2-12 and 2-13. The land use analysis must be able to clearly show that the City's Plan meets the minimum average density 3-5 units per acre for Rural Center communities.	Met Council	We have reworked many of the tables displaying acreages to be more consistent across tables and reduce confusion.
3.	In the Land Use section on pages 212 to 2-37 (pages 26 through 51 of the pdf), the Plan must include a definition of the expected share of individual land uses and permitted density ranges for residential uses in mixed-use districts. While there are density ranges listed in the Tables 2-8, 2-10, and 2-11, no expected share of uses is included for mixed-use districts. Please include a table of the expected share (such as 30% commercial, 40% office, 30% industrial) in one of those tables. Consider if Table 2-10 might be the best fit. Tables 2-10 and 2-11 could be combined to accomplish this, if shares are added.	Met Council	We have added this description to Section 3A description of land use. This is also reflected in all land use calculations.
4.	In the Staged Development and Redevelopment section on pages 2-34 to 2-37 (pages 48 to 51 of the pdf), add table of staged development in 10-year increments including future land uses, area in acres, density ranges, and total residential units by each 10-year time increment must be included. This is not clearly depicted in any single table.	Met Council	We have reworked many of the tables displaying acreages to be more consistent across tables and reduce confusion.
5.	Properties currently in the Metropolitan Agricultural Preserves Program are identified as Agricultural land use, as required by state statute. The land use description must also include a statement including a "maximum density of 1 unit per 40 acres" to ensure the properties enrolled meet the statutory requirement.	Met Council	Sentence added, in Section 3F.
<b>Advisory Comment</b>			
<b>Number</b>	<b>Comment</b>	<b>From</b>	<b>Status</b>
1.	County staff supports the City's objective to include redevelopment and infill strategies as a component to city's growth plans.	Scott County	Comment is acknowledged, no changes have been made.



2.	Preserving land in the unincorporated area for future development on municipal sewer and water is a key component of the County's growth management philosophy. When comparing the city's planned land use map and county's planned land use map, all properties shown on Map 2-4 Future Land Use for city land use guidance are encompassed within the County's 2040 planned land use map as "Urban Expansion" or "Urban Business Reserve". Most of the properties shown on Map 2-5 Post 2040 Future Land Use for city land use guidance are also designated on the County's map in the urban expansion or reserve categories.	Scott County	No changes have been made. The City of Jordan believes the Urban Expansion Area shown in the Scott County Future Land Use Map should be expanded to include all land area within the City of Jordan Post-2040 Future Land Use Plan.
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## Natural Resources/Special Resources

### Incomplete Comments

Number	Comment	From	Status
Advisory Comment			
Number	Comment	From	Status
1.	Community Forestry. The plan draft references the importance of tree canopy and the city's tree preservation ordinance. The potential for loss of tree canopy due to threats such as emerald ash borer and oak wilt can negatively affect health and environment, and a planned community forest can provide numerous community benefits. The first step to achieving a resilient community forest is conducting a tree inventory. The second step is developing a community forestry management plan that includes strategies for managing trees, especially ash, and encouraging a diverse tree canopy on private and public lands. It would be worth mentioning in the Comprehensive Plan if Jordan has an existing forestry plan as part of a strategy to meet environmental goals and policies. We recommend the City includes pursuit of Tree City USA status as part of its implementation plan.	DNR	Comment acknowledged. Plan includes current level of commitment by the city to tree preservation and management.
2.	Ecological Resources. The DNR supports including data from the Natural Heritage Information System (NHIS) in the Comprehensive Plan. We recommend that the plan include goals and strategies to address how rare species and plant communities will be	DNR	Map 2-9 has been modified to include MBS Native Plant Community

	<p>protected. Two data layers useful for land use and conservation planning include the MBS Native Plant Communities and the MBS Sites of Biodiversity Significance. GIS shapefiles of these data layers can be downloaded from the Minnesota Geospatial Commons. The DNR recommends avoidance of these ecologically significant areas, especially MBS Sites of Outstanding or High Biodiversity Significance and DNR Native Plant Communities with a conservation status rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable to extirpation). We recommend that Comprehensive plans include a map of both of these layers and a list of the types of native plant communities documented within the plan's boundaries. For further conservation planning and to ensure compliance with the Minnesota endangered species laws, the DNR encourages communities to check the NHIS Rare Features Data for known occurrences of state-listed species. The NHIS Rare Features Data contains nonpublic data and can only be accessed by submitting a License Agreement Application Form for a GIS shapefile or by submitting a NHIS Data Request Form for a database printout. Both of these forms are available at the NHIS webpage.</p> <p>For more information on the biology, habitat use, and conservation measures of rare species, please visit the DNR Rare Species Guide. NHIS training includes rules for using/displaying nonpublic data in public documents.</p> <p>Links: MBS Sites of Biodiversity Significance  <a href="http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html">http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html</a>  MBS Native Plant Communities  <a href="http://www.dnr.state.mn.us/npc/index.html">http://www.dnr.state.mn.us/npc/index.html</a></p>		and MBS Sites of Biodiversity Significance.
3.	<p>Native Species. Encourage private and public developments to be planted with native flowers, grasses, shrubs and tree species. Species such as monarchs rely on these plants, and it does not take many plants to attract butterflies, other beneficial pollinators as well as migrating and resident birds. Adding more native plants into landscaping, not only enhances the health and diversity of pollinators and wildlife populations, these plants can also help filter and store storm water, a strategy which would help to fulfill other goals in your plan. For more information consult DNR's pollinator page.</p> <p>Plant lists and suggestions for native plants can be incorporated into:</p> <ul style="list-style-type: none"> <li>Proposed landscape guidelines to improve the aesthetics in for commercial and industrial areas</li> </ul>	DNR	Comment is acknowledged. Plan includes current level of commitment by the city, given its limited budget and resources, to requiring, maintaining, and establishing, native plantings.

	<ul style="list-style-type: none"> <li>• Street tree planting plans</li> <li>• City gateway feature</li> <li>• Along ponds and waterways.</li> <li>• Small nature play areas in children's parks</li> <li>• Along the edges of ballfield complexes.</li> </ul>		
4.	<p>Development/Transportation and Wildlife. In another measure to preserve the natural environment, consider adding policies that take wildlife into consideration as transportation and redevelopment projects occur. To enhance the health and diversity of wildlife populations, encourage developers of both private and public lands to retain or restore natural areas by planting them with native species. One larger area is better than several small "islands" or patches; and connectivity of habitat is important.</p> <p>Animals such as frogs and turtles need to travel between wetlands and uplands throughout their life cycle. Consult DNR's Best Practices for protection of species and Roadways and Turtles Flyer for self-mitigating measures to incorporate into design and construction plans. Examples of more specific measures include:</p> <ul style="list-style-type: none"> <li>• Preventing entrapment and death of small animals especially reptiles and amphibians, by specifying biodegradable erosion control netting ('bio-netting' or 'natural netting' types (category 3N or 4N)), and specifically not allow plastic mesh netting. (p. 25)</li> <li>• Providing wider culverts or other passageways under paths, driveways and roads while still considering impacts to the floodplain.</li> <li>• Including a passage bench under bridge water crossings. (p. 17) because typical bridge riprap can be a barrier to animal movement along streambanks.</li> <li>• Curb and stormwater inlet designs that don't inadvertently direct small mammals and reptiles into the storm sewer. (p. 24). Installing "surmountable curbs" (Type D or S curbs) allows animals (e.g., turtles) to climb over and exit roadways. Traditional curbs/gutters tend to trap animals on the roadway. Another option is to install/create curb breaks every, say, 100 feet (especially important near wetlands).</li> <li>• Using smart salting practices to reduce impacts to downstream mussel beds, as well as other species.</li> <li>• Fencing could be installed near wetlands to help keep turtles off the road (fences that have a j-hook at each end are more effective than those that don't).</li> </ul>	DNR	Comment is acknowledged. Plan includes current level of commitment by the city, given its limited budget and resources, to protection of wildlife impacts.

5.	P. 2-21. Because of the significant resources described in the plan, such as wetlands, waterways and bluffs, we recommend including these significant natural features as an underlay to the proposed land use map, similar to the layer of undevelopable land shown on the redevelopment map.	DNR	Comment is acknowledged. The future land use mapping has not been modified. This information is included on maps 2-10 and 2-11, however.
6.	P. 2-31 describes new residential policies. In addition to the commendable policies 2 through 4, we recommend adding language that encourages protection of grasslands and planting of native grasslands, as these are vital to supporting pollinators, birds and other wildlife. See below.	DNR	Comment is acknowledged. Plan includes current level of commitment by the city, given its limited budget and resources, to requiring, maintaining, and establishing, native grasslands.
7.	P. 2-52 to 2-54. The city should consider adopting clear goals and policies to address the continued flooding the community is experiencing. We support policies to increase flood resiliency which would then be a foundation for initiatives such as adoption of higher standards in ordinances, preserving flood storage capacity, acquisitions of at-risk structures, permanently preserving key open spaces, and streambank restoration. This is of particular importance considering the city's growth, which means there exists the potential for continued alteration of hydrology.	DNR	Natural resource goals 6.6 and 6.8 have been modified. Natural resource goal 6.7 has been added.
8.	In Chapter 2-F, consider adding an additional policy to buy out properties that frequently flood and replace them with green space/park. This would also contribute to the City's resiliency goals. Consider appropriate grant programs to assist such as: <a href="https://www.dnr.state.mn.us/grants/water/flood_hazard.html">https://www.dnr.state.mn.us/grants/water/flood_hazard.html</a>	DNR	The City does not desire to immediately buy-out properties for replacement with green space as a standalone effort, however such considerations will be factored into goal 6.8 for implementation of a flood control project.

9.	Considering the extent of public water wetland 70-220W south of Hwy 169, and please add the public waters inventory layer to Map 2-10.	DNR	Map 2-11 illustrates the PWI basin. Map 2-9 has also been modified to illustrate the significant biological resources in that area.
10.	On P. 2-49 -- According to MN Statutes, Sections 103F.101 to 103F.151 may be cited as the "Floodplain Management Law." Please change Flood Plain to "Floodplain." It would be more accurate to state that DNR is responsible for oversight, including approving ordinances before communities adopt them, etc. Communities are responsible for ordinance implementation at the local level. DNR is the coordinating agency and has oversight responsibilities but the Floodplain Management Law, Minn. Stat. 103F, is administered at the local level.	DNR	The text has been updated as requested.
11.	Within Section D. Floodplains. The plan recaps the history of flooding, and indicates that nothing has yet been done to address the recurrent flooding. It would be appropriate to address and include what the City plans to do now and in the future, to reduce flooding problems as this Comprehensive Plan is intended to be a forward-looking document. Please revise the 2017 FIRM adoption to 2019.	DNR	Content has been added to the end of Section D in response to this comment. The anticipated adoption of the FIRM has been modified and a summary of the recently completed flood control feasibility study has been added to indicate the future intent of the City.
12.	Section VI., Natural Resources Goals and Policies is very well done.	DNR	Comment is acknowledged, no changes made.
13.	For Map 4-8 (see attached marked-up map), consider indicating an alternative to single- and medium-density residential in the circled area. Residential development would not be allowed within the public water wetland located in this area.	DNR	Comment is acknowledged, but no changes have been made. It is agreed this area is largely undevelopable due to

			the presence of wetlands and public waters in the area, however the land use map is administered by parcel. Separate considerations are made and mapping available to demonstrate wetland and public water development constraints.
14.	Page 4-46 Goal 3. It would be worth noting here that many of these efforts also serve the purpose of building resiliency to reduce flooding. For example, setting aside an area where Sand Creek could access the floodplain can reduce erosion, decrease sediment transport and decrease flooding in other areas.	DNR	Comment is acknowledged. Reference has been made to the 2018-2019 flood control feasibility study in the revised plan.
15.	Pg. 4-49. Policy 4.10: The policy states, “The City will not allow excavation, or other non-filling related alterations to an existing wetland without the expressed written approval of the City Administrator or designee.” Please note that no filling within DNR public water wetlands is allowed for development. Other fill in public water wetlands, such as the large wetland south of 169 in Jordan, must be approved by the DNR. You may want to note the difference between WCA vs. DNR wetlands and regulatory roles.	DNR	Text has been modified to acknowledge the difference in regulation between WCA and public water wetland management.
16.	Pg. 7-4. You might consider adding the MN DNR as a partner for floodplain resources, such as the grant program for frequent flooding.	DNR	Text has been modified. The DNR has been acknowledged as a partner of the City.

	<b>Housing</b>		
	<b>Incomplete Comments</b>		
Number	Comment	From	Status
1.	Tools noted as an option to address housing needs must include what circumstances and when, if applicable, they would be used. Housing Bonds are a noted tool, but no additional description as to when the City would consider its use is given. The Plan states that Scott	Met Council	This is included in Column 3, Circumstances and

	County is the conduit for housing bonds, but cities can issue bonds as well, and this is not mentioned.		Sequence of Use, in Tables 6-15 and 6-16.
2.	<p>Land guided to address the City's allocation of affordable housing need for 2021-2030 is not sufficiently described for review:</p> <ul style="list-style-type: none"> <li>• It unclear whether the development potential for affordable housing noted on p. 6-4 is anticipated between 2021 and 2030 or some other timeframe. The City's allocation is tied to forecasted growth for that decade, and land guided to address it must be anticipated to develop in that same decade.</li> <li>• Residential land uses described in Table 2-13 appear to indicate only 1 acre of High Density land and 1 acre of Mixed Use land would be needed for development in 2021-2030. This is inconsistent with Table 6-12 by a significant amount. Some sort of staging table indicating anticipated High Density Residential and Mixed Use development for the 2021-2030 decade should be described clearly and consistently in both the Land Use and Housing chapters.</li> </ul>	Met Council	The land use and housing tables have been revised so they are consistent with one another, and provide for the development of affordable housing. Staging is indicated in Table 2-25 and Table 6-13.
3.	<p>Some widely used tools to address housing needs aren't included. To be consistent, tools must be acknowledged, and the Plan should state if, and if so when and why, it would consider using them to address housing needs:</p> <ul style="list-style-type: none"> <li>• Explore and advocate for a Community Land Trust to investigate the potential for affordable homeownership options</li> <li>• City support/sponsorship of applications to Minnesota Housing's Consolidated RFP</li> <li>• Site assembly</li> <li>• A Fair Housing policy (note additional information about Fair Housing Policy in advisory comments)</li> <li>• Tax Abatement</li> <li>• Resources available through the City's EDA.</li> <li>• Preservation resources, especially with respect to existing manufactured housing.</li> </ul>	Met Council	Again, this is included in Column 3, Circumstances and Sequence of Use, in Tables 6-15 and 6-16. Additional tools have been added.
4.	Furthermore, to be consistent, all housing tools described will be linked clearly and consistently to stated housing needs, including needs connected to various levels of affordability. For example, Livable Communities Act programs are described in support of affordable housing needs at 30% AMI or less, but not other levels of affordability.	Met Council	This is included in Tables 6-15 and 6-16.
5.	Please note, forecast changes, discussed above, have increased Jordan's allocation of the region's need for affordable housing for the 2021—2030 decade. The Plan needs to acknowledge its updated allocation of 294 units (107 units at ≤30%AMI; 63 units at 31-	Met Council	The allocation has been revised.

	50% AMI; 124 units at 51-80% AMI) and guide sufficient high density/mixed use residential land such that as many units could be built in the 2021—2030 decade.		
Advisory Comment			
Number	Comment	From	
1.	Cities can issue housing bonds as well (not just county), but this is not mentioned	Met Council	This is now noted.
2.	On page 6-15, the Plan indicates that land could be guided or zoned for senior housing. Council staff advise that it may not be legal to guide or zone land for a particular population. Council staff suggest consulting with the City attorney to evaluate that statement.	Met Council	The comment was intended to refer to zoning suitable for senior housing. This has been clarified.
3.	On p. 6-18, the Plan states that the City would support/sponsor applications to Livable Communities Act programs. In reality, a participating city must be the direct applicant for those funds. Please clarify for what types of housing needs the City would consider applying for LCA funds.	Met Council	This language is taken directly from the Met Council Fact Sheet-Linking Tools to Need.
4.	<p>With respect to a Fair Housing policy. Local Fair Housing policies do not mean that City's should or can manage or administer Fair Housing complaints. A local fair housing policy rather ensures the City is aware of fair housing requirements with regard to housing decisions and provides sufficient resources to educate and refer residents who feel their fair housing rights have been violated (this can be as simple as having links to resources on the city's website). The Metropolitan Council will require a Local Fair Housing policy as a requirement to draw upon Livable Communities Act (LCA) awards beginning in 2019. To learn more, please refer to the following resources:</p> <ul style="list-style-type: none"> <li>• Creating a Local Fair Housing Policy webinar: <a href="https://www.youtube.com/watch?v=38JY4pNGnZ8&amp;feature=youtu.be">https://www.youtube.com/watch?v=38JY4pNGnZ8&amp;feature=youtu.be</a></li> <li>• Best practices: <a href="https://metro council.org/Handbook/PlanIt/Files/Webinar-Fair-Housing-Handout2.aspx">https://metro council.org/Handbook/PlanIt/Files/Webinar-Fair-Housing-Handout2.aspx</a></li> <li>• Policy template: <a href="https://metro council.org/Handbook/Training/Webinars.aspx">https://metro council.org/Handbook/Training/Webinars.aspx</a> - click on Handout 1 under the Implementing A Local Fair Housing Policy at the bottom of the screen.</li> </ul>	Met Council	Added policy to housing goal 2 regarding considering fair housing policy.
5.	Council staff strongly encourage City staff to ensure the Plan addresses the important need to protect and support its Manufactured Home community. Rehabilitation resources, conversion to a co-operative (if not one already), local notice-of-sale, or first-look provisions could be considered.	Met Council	The plan recommends maintaining existing



			manufactured housing
6.	Council staff strongly encourage the City to consider an Accessory Dwelling Unit (ADU) policy. This is an effective way to diversify housing choices within existing single—family neighborhoods	Met Council	Comment acknowledged
7.	All of the existing housing data (including the price of a home affordable to a household earning 80% AMI) sourced from the Metropolitan Council has been updated with 2016 data. Council staff recommend reviewing the updated Existing Housing Assessment on Jordan’s community page in the Local Planning Handbook and updating any relevant data	Met Council	Tables have been updated to include 2016 data.

<b>Parks and Trails</b>			
<b>Incomplete Comments</b>			
Number	Comment	From	Status
1.	Page 2-34 (48), 5-13 (202), 5-32 (221): Blakely Bluffs Regional Park Reserve is known as: Blakeley Bluffs Park Reserve.	Scott County	The text has been updated.
2.	Page 5-13 (202): Both Blakeley Bluffs Park Reserve and Doyle-Kennefick Regional Park are planned facilities. It is important to clarify to residents that these facilities are not yet open to the public. Murphy’s Landing is now known as The Landing.	Scott County	The text has been updated.
3.	Page 5-22: County staff is willing to work with city staff when and if a development is ever proposed in Sand Creek or St Lawrence Township near a city park search area. The County provides incentives for developers who preserve public values - such as a future public park site – and dedicate land within a plat in exchange for additional density or development standard flexibility.	Scott County	County added in implementation plan chapters as a partner in implementation
4.	Page 5-32 (221): Blakeley Bluffs Park Reserve is envisioned to be an approximately 2,440 acre park reserve.	Scott County	The text has been updated.
5.	Page 5-35 (224): This map appears to show an older version of the trail with a northern alternative. The link to this master plan outlines the approved alignment. <a href="https://www.scottcountymn.gov/DocumentCenter/View/1356/Spring-Lake-Regional-Trail-PDF">https://www.scottcountymn.gov/DocumentCenter/View/1356/Spring-Lake-Regional-Trail-PDF</a>	Scott County	The map has been updated, and a reference to this plan has been included.

Transportation			
Incomplete Comments			
Number	Comment	From	Status
1.	Assign 2020 and 2030 forecasts to TAZ (show all 3 decades)	Met Council	Forecasting, analysis, and mapping for the City of Jordan future transportation demands are being completed by Scott County based on the revised population forecasts. Forecasts will be re-assigned and associated volumes re-mapped once this information is available from the County. A note has been added to the Traffic Forecast Modeling section regarding this.
2.	A future functional classification system was prepared, identifying ultimate functional classifications of Scott County roadways at full-build out. This future classification will allow the County to implement long-range corridor studies and prevent short-term developments from impacting a roadway's end use (i.e., prevent direct accesses, implement access spacing guidelines, etc.). Please match the County's future functional class designation of County Highway 8 as a future Principal Arterial.	Scott County	Modifications have been made in multiple locations such that County Highway 8 has been identified as a future Principal Arterial in the Plan.
3.	Jurisdictional transfers, or turnbacks, are a crucial part of future roadway planning process. Please take note of what roadways in Scott County's 2040 Comprehensive Plan may be transferred from the County to the City of Jordan and make reference of these roadways in the Transportation Chapter.	Scott County	CH 61 was identified a potential jurisdictional transfer in the County's plan and has been similarly reflected in the City's Plan. Conversations regarding the City's willingness to accept this transfer will still need to occur before a transfer will be considered by the City.
4.	Scott County currently has a policy of constructing bicycle and pedestrian facilities on both sides of county highways in urban areas. Please include this policy into the City's discussion of trails and sidewalks along roadways. See the	Scott County	Reference to this County policy has been made in the

	Alternative Modes Goals, Policies, And Strategies section of Scott County's Transportation Chapter for more information.		Goals/Policies section of the City's plan.
5.	Thank you for including information on county and regional transportation studies as part of the Transportation Chapter. Please include a summary of the 169 Mobility Study as part of this section.	Scott County	A summary has been provided along with a link to MnDOT's study website.
6.	<p>On page 103 under current conditions, here is some suggested text:</p> <p><b>Dial-a-Ride Service:</b> SmartLink is the mobility manager for Scott County and consists of four transit services:</p> <ul style="list-style-type: none"> <li>• Transit Link which is a contracted dial-a-ride service through the Metropolitan Council. It is a shared-ride, reservation-only transit service. Fares are established by the region.</li> <li>• A supplemental volunteer driver program for trips that are denied on the Transit Link. Volunteers drive their own vehicles and donate their time to provide transportation that could not be scheduled on the bus systems.</li> <li>• A shared vehicle program which coordinates the use of a vehicle that allows multiple users to use a small bus for a wide range of services and transportation options.</li> <li>• SmartLink coordinates non-emergency medical transportation to provide a non-emergency medical service to patients to non-emergency medical service appointments.</li> </ul> <p><b>Land to Air:</b> A subsidiary of Jefferson Lines, operates an inter-city bus service from Mankato to downtown Minneapolis. The inter-city transit service is subsidized by a MnDOT grant which is a funding source dedicated for inter-city transit options. Known as the "Land to Air" the inter-city bus service includes two round trips daily from Mankato to downtown Minneapolis. Stops at MNSU-Mankato, Gustavus Adolphus College, St. Peter, Le Sueur, Belle Plaine, and Shakopee. This service connects to Minnesota Valley Transit Authority Route 495 at Burnsville Transit Station, which connects to transit options at Burnsville Transit Station and Minneapolis. The connection in downtown Minneapolis is the Hawthorne Transportation Center which connects to statewide and national inter-city transit options.</p>	Scott County	The suggested text has been included.
7.	Page 3-12(82), 3-36(106): A search corridor is a tricky resource to display. It is not intended to show a specific course – but rather a generalized route that connects features. The County has not master planned this route and would not want to imply that the route goes through any specific property. The County's approach to displaying these corridors has been to present them as a thick, transparent line, perhaps 3 or 4 times the thickness of what is presented here. Staff recommends a similar treatment in the city's plan.	Scott County	The figure has been modified to show a widened search corridor.

Advisory Comment			
Number	Comment	From	Status
1.	The first paragraph on page 3-33 (page 103 of the pdf) is not an accurate description of "public" transit. However, given that the section is labeled "Transit" rather than "Public Transit," it may be appropriate. Staff suggest the definition of transit be reconsidered.	Met Council	Some text modifications have been made to this section to differentiate further between 'transit' and 'public transit'.
2.	Consider dropping the second paragraph of the introduction on page 3-33, because it does not add information that is useful or addressed in the rest of the chapter	Met Council	This paragraph has been deleted.
3.	In the 1 <sup>st</sup> paragraph of I. Current Conditions on pg 3-33, delete "taxing" and replace it with "capital levy" to better reflect the actual name of the district	Met Council	The suggested text edit has been made.
4.	in the same paragraph, the Plan should reference the Transit Link dial-a-ride service provided within the City. City staff should consult with the Minnesota Valley Transit Authority (MVTA) and Scott County on the preferred way to discuss Transit Link services available in Jordan.	Met Council	The suggested text edit has been made.
5.	The Plan should note that the closest transit service may be accessed at the Marschall Road Transit Station located at Hwy 169 & Marschall Road. 0 Consider adding that routes 490, 493, 495, 497 and 499 serve the station with service from 5:35 am. until 11:20 pm. (depending on location served). Also, consider adding that service from the Marschall Road Transit Station includes express service to downtown Minneapolis, service to Burnsville and the Mall of America as well as various locations in Shakopee	Met Council	The suggested text edit has been made.
6.	Please note that the Blue Express service is provided by MVTA.	Met Council	The suggested text edit has been made.
7.	Consider deleting the word, "are" in the first line of the last paragraph on page 3-35 (page 105 of the pdf).	Met Council	The suggested text edit has been made.
8.	County staff will continue to work with the city to review and evaluate traffic impacts associated with the proposed Minnesota Renaissance Festival site southwest of Jordan.	Scott County	Comment is acknowledged.

Wastewater			
Incomplete Comments			
Number	Comment	From	Status

1.	in Chapter 4 (tables 4.1 and 4.4), the City describes its sewer—served forecast of households, population, and employment. The sewer-served employment forecast (3,250 jobs) is higher than the community total forecast (2,800 jobs) in Chapter 2. it is unclear whether this is an error or an inconsistency, or if the City is serving commercial customers in the neighboring townships. To be complete, the City must resolve or explain this table	Met Council	The employment numbers have been updated. The former version was a simple typo.
<b>Advisory Comment</b>			
Number	Comment	From	Status
1.	Ultimate Growth Boundary. Map 4-2 showing the “2040 Growth Boundary” and the “Ultimate Growth Boundary” is helpful in evaluating the boundary in the County’s 2040 planned land use map between “Urban Expansion” and “Transition Area”. All of the properties within the “Ultimate Growth Boundary” are included in the Transition Area, which is intended to limit rural residential development and preserve land for post-2040 development on municipal sewer and water.	Scott County	Thank you. No changes have been made. The City of Jordan believes the Urban Expansion Area shown in the Scott County Future Land Use Map should be expanded to include all land area within the City of Jordan Post-2040 Future Land Use Plan.

<b>Surface Water</b>			
<b>Incomplete Comments</b>			
Number	Comment	From	Status
1.	include a summary of the appropriate water resources management—related agreements that have been entered into by the City. The Plan includes a subsection on page 4-42 to cover this topic, however it does not offer any specific agreements between the City and other municipalities. The fact that the City’s groundwater protections are outlined in Elko New Market’s Well Head Protection Plan is an example that should be included in this section. Additional agreements between the City and the MPCA regarding the TMDL for Sand Creek could also be included	Met Council	No such agreements exist. The referenced Elko New Market typo has been corrected.
2.	include drainage areas, volumes, rates, and paths of stormwater runoff. The City identified that the extreme volume of data in the modeling files precludes the City from including this in the Plan. Council staff agree that the entire model is not necessary for inclusion, however a summary of the volumes and rates would be beneficial to improving the Plan	Met Council	No changes have been made. The plan does include an adequate summary with the

			following information: Map 4-12 showing flow direction, proposed regional ponds & areas to be served by those ponds, local ponds, proposed pipes and channels along with 6. Existing Watersheds and Required Improvements on page 4-66 of the Plan.
3.	include more clarity in the description of the storm event analysis. In the process of analyzing the functionality of the existing pond and culvert system the City used "storm events less than or equal to the 100-year, 24-hour storm." Please state if the precipitation estimates were based on data from NOAA Atlas 14 or from another source.	Met Council	Paragraph 2 under section 7. Conclusions has been modified to state the NOAA Atlas 14 precipitation estimates will be used.
4.	The Plan indicates there are a number of wetlands within its geographic boundary and references the state Wetland rules and the County wetland rules. However, the city is proposing to be the responsible entity to administer the state wetland program. The Plan needs to include the details on how wetlands functions and values will be classified, monumentation requirements, what is the period of inundation, what wetland function and value classification system should be used and setback requirements.	Met Council	No changes have been made. The City agrees with the Scott WMO comment (number 9 below) and feels the plan adequately addresses this aspect.
5.	Section 7, Implementation, needs to be improved in the following ways: a. The City needs to commit to actions identified in the implementation program. The Plan indicates actions shown in the table on pg.4-57 and 4-58 are suggestions presented for the "City Council's consideration" but not a clear commitment to action. Instead these actions should be as complete and accurate as possible giving the timing of the Plan. b. Each action in the implementation plan needs to have schedule, estimated cost, and funding source identified as specifically as possible. The Plan generally lays out potential funding sources for projects. Where possible, the funding sources need to be specified by project. Each project needs to have an estimated dollar amount associated with it, rather than a range. The implementation program should include annual budget totals. The implementation program should include years all the way through the year the local water plan extends, with specific actions scheduled for all years.	Met Council	Modifications to the table have been made. Estimated costs have been provided where feasible for the respective items. The capital improvement plan has also been added to the plan.

6.	As a requirement of the Council's Minimum Requirements, the Plan must have a table describing the capital improvement program that sets forth by year, details of each contemplated capital improvement that includes the schedule, estimated cost, and funding source.	Met Council	The capital improvement plan has been added as section 7.H.
7.	In addition to the above requirements that must be met, the Council recommends the City consider adopting MPCA Minimal Impact Design Standards (MIDS). MIDS mimics natural hydrology in order to reduce flooding, minimize pollutants entering our waterbodies, and recharge groundwater.	Met Council	The comment is acknowledged. The City of Jordan and its residents have limited financial resources and thus is not interested in adopting MIDS as a requirement upon itself or its residents.
8.	We would like to note that after reviewing Met Council's comments, staff does not agree with comment #2. Scott WMO staff feels the city did include an adequate summary with the following information in their Plan including: Map 4-12 showing flow direction, proposed regional ponds & areas to be served by those ponds, local ponds, proposed pipes and channels along with 6. Existing Watersheds and Required Improvements on page 4-66 of the Plan.	Scott WMO	Comment acknowledged. No changes have been made.
9.	We would also like to note that after reviewing Met Council's comments, staff does not agree with comment #4 where Met Council states; "The Plan needs to include the details on how wetlands functions and values will be classified monumentation requirements, what is the period of inundation, what wetland function and value classification system should be used and setback requirements. "Neither Minnesota Statute 103B.235 Local Water Management Plans, nor Minnesota Rule 8410.0160 Local Water Plans requires this information in the local water plans. With that said, the Scott WMO will require City of Jordan LWP Review" Page 1 of 3 equivalency of the City's ordinances with the Scott WMO Standard G -Wetland Buffer rule when we review your ordinances. That equivalency will require the city to demonstrate it is meeting the criteria set forth in those rules [2.Criteria, (a) through (0)]	Scott WMO	Comment acknowledged. No changes have been made.
10.	Page 4-50, Goal 6: Groundwater Management, 1st paragraph refers to the city of Elko New Market Wellhead Protection Plan, as well as the first sentence in the second paragraph. Staff is assuming this is a typo and should read city of Jordan Wellhead Protection Plan?	Scott WMO	This typo has been corrected.
11.	Page 4-54, Table 4-19, please reference the Map 4-12 somewhere in the discussion of the Storrnwater Area Charge	Scott WMO	Text change has been made as suggested.

12.	Page 4-55, VII. Implementation. Please describe how the City prioritizes city street sweeping and how frequently it's done. For example, what is the City's schedule for street sweeping; does the city sweep in the spring and fall? What areas do you prioritize for street sweeping in those seasons? Areas of the City that directly drain to Sand Creek or the Minnesota River, the roads Where more sand is used, areas that drain to the Mill Pond?	Scott WMO	The City sweeps roadways in the spring and fall. Typically, the entire City is done in a relatively short amount of time given its size, and therefore a prioritization of roadways is not included.
13.	Page 4-57, table of actions listed in order of priority. Consider giving this table a name, such as Table 4-20 (next in the series) with a title for easy reference.	Scott WMO	The table has been titled 'Table 4-21 – Implementation Program'.
14.	Page 4-58, table of priority actions, third row under Funding Source column; states City of Elko New Market, should this be changed to City of Jordan? In addition in the same table, last row under Action column; change Sand Creek TMDL to Lower Minnesota River TMDL/WRAPS Study.	Scott WMO	Text changes have been made accordingly.
15.	Page 4-58, Section VIII. Amendments to the Plan. The city indicates in this section: "This Plan shall remain in effect for five years from its adoption by the Councilor until an amended Plan is adopted, not to exceed 10 years from the date of the initial adoption. " Is there something planned five years from now that the city plans on amending their Plan?	Scott WMO	Reference to potential modification of the plan in 5 years has been deleted.
16.	Page 4-65, 5. Pond Design Goals and Criteria, paragraph five, second sentence; "The proposed detention/water quality ponds may be designed as non-uniform meandering waterways, creating a more natural appearance while maintaining the designing intent and providing cost savings by reducing the length of large diameter pipe. " Staff loves this idea!	Scott WMO	Comment acknowledged. No changes have been made.
17.	Page 4-69, 7. Conclusions; The first sentence in this paragraph states that "The City's existing storm sewer treatment and conveyance system cannot accommodate continued development in the regional growth boundary area." The city might consider adding onto this statement with continuing to say, "without upgrades of existing infrastructure" or something of that nature. Staff's concern is that, a citizen who reads this, they may have an excuse to approach the city with a development moratorium request if any more development is proposed.	Scott WMO	Text changes have been made as suggested.
18.	Page 4-69, 7. Conclusions, second paragraph; "The regional and localized stormwater detention/water quality pond model presented in this Plan is one approach to accommodate the predicted urban development in the regional growth boundary area of the City. " The model is based on precipitation estimates from the Technical Paper 40	Scott WMO	Text changes have been made to this section as suggested.



	which is now generally considered dated, and not representative of more recent rainfall patterns. Staff suggests modifying the language in this paragraph to indicate the city will use the most recent information on rainfall estimates (i.e. Atlas 14) to ensure sizing of future development infrastructure and any needed upgrades to the existing infrastructure will not cause additional flooding issues. We're not suggesting the system modeling needs to be redone; just that rainfall information will be used for sizing infrastructure before it's built. Although, maybe the city should consider in the near future, updating your model given the conclusion of the Plan that the system cannot accommodate continued development, as this was made based on older information and you've already indicated you know where the stress points are		
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Forecasts			
Incomplete Comments			
Number	Comment	From	Status
1.	The Plan needs to assign 2020, 2030, and 2040 forecasts to transportation analysis zones (TAZs). The TAZ allocation in table 3.8 has 2040 totals that are significantly low, missing half of Jordan's employment, households, and population in both the base year and 2040. To be complete, the City should provide intermediate years (2020, 2030) forecast allocations and update the forecasts to reflect the correct and total allocation for employment, households, and population in all columns.	Met Council	Forecasting, analysis for the City of Jordan future transportation demands are being completed by Scott County based on the revised population forecasts. Forecasts will be re-assigned and associated volumes re-mapped once this information is available from the County.
Advisory Comment			
Number	Comment	From	Status
1.	The draft Plan includes the Metropolitan Council forecast for 2020, and revised forecasts for 2030 and 2040 (table 2.1). City and Metropolitan Council staff discussed the forecast revision in March—April 2018. Council staff find the forecast revision acceptable. The Metropolitan Council will officially revise the forecast effective with action on the final Plan. For reference:	Met Council	Comment acknowledged.

		Census 2010	Estimate 2016	Previous Council Forecasts			Revised Council Forecasts					
		2010	2016	2020	2030	2040	2020	2030	2040			
		Population	5,470	6,213	6,900	8,300	9,900	6,900	9,600	12,200		
		Households	1,871	2,122	2,500	3,160	3,900	2,500	3,600	4,700		
		Employment	1,587	1,923	2,200	2,500	2,800	2,200	2,500	2,800		
2.	Chapter 2 of the draft Plan describes land supply for future housing. In table 213, the City identifies “2016 available acres” and “2040 net new acres.” Adding these columns together, the land supply includes 377 acres for low-density residential; 215 acres for medium—density residential; 2 acres for high—density residential. if all of this land supply is fully developed, at the mid—point of allowed density ranges, the land supply can accommodate over 4,000 additional housing units										Met Council	We have reworked many of the tables displaying acreages to be more consistent across tables and reduce confusion.
3.	The land supply meets the Metropolitan Council's expectation of guiding enough land to accommodate the growth forecast. Council staff note that the land guidance provides housing capacity substantially above and beyond the 2040 forecast; Council’s forecasts assume that about one—third of this land supply will be developed and absorbed after 2040.										Met Council	Comment acknowledged.
4.	Council staff note that table 2.9, identifying “net non-constrained acres,” depicts a significantly smaller land supply. The City should clarify the meaning of this table, and/or verify the information provided.										Met Council	We have reworked many of the tables displaying acreages to be more consistent across tables and reduce confusion.
5.	The land supply analysis in table 212 is confusing and contains calculation errors; the City should correct table 212										Met Council	We have reworked many of the tables displaying acreages to be more consistent across tables and reduce confusion.

## Implementation

### Incomplete Comments

Number	Comment	From	Status
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1.	Need to address a defined timeline for when actions will be taken to implement each required element of the Plan, as well as a schedule for the preparation, adoption, and administration of needed changes to official controls.	Met Council	Table with timelines and implementing partners added
Advisory Comment			
Number	Comment	From	Status
1.	County staff supports the City's objective of working with surrounding townships to develop or implement Orderly Annexation Agreements. The County is ready to assist the city and township on these important agreements.	Scott County	Comment acknowledged

September 6, 2018

Lucinda Meyers, Planner  
City of Jordan  
210 East First Street  
Jordan, MN 55352

**RE: Preliminary Review of the City of Jordan 2040 Comprehensive Plan**  
Metropolitan Council District 4  
Metropolitan Council Review File No. 27987-0

Dear Ms. Meyers:

Metropolitan Council staff have reviewed the preliminary draft of the City of Jordan's 2040 Comprehensive Plan (Plan), received on June 21, 2018. In the preliminary review, staff focused on whether the draft Plan appeared to be complete and contained any major system issues or policy conflicts. Time did not permit as thorough of a review as will occur when the Plan is officially submitted for Council review. A more detailed review may reveal other important matters that were not identified during this preliminary review.

When addressing the matters in this letter, City staff are advised to refer to the City's Checklist of Minimum Requirements in the Community pages of the online Local Planning Handbook and the City's System Statement:

City of Jordan's Checklist of Minimum Requirements:

[https://metro council.org/Handbook/Files/Checklist/02395483\\_Jordan\\_Checklist.aspx](https://metro council.org/Handbook/Files/Checklist/02395483_Jordan_Checklist.aspx)

City of Jordan's Community Page:

<https://lphonline.metc.state.mn.us/CommPage?ctu=2395483&applicant=Jordan>

City of Jordan's System Statement:

[https://metro council.org/Communities/Planning/Local-Planning-Assistance/System-Statements/System-Statements/02395483\\_Jordan\\_2015SS.aspx](https://metro council.org/Communities/Planning/Local-Planning-Assistance/System-Statements/System-Statements/02395483_Jordan_2015SS.aspx)

The preliminary review process found the following sections **complete for review** and did not identify any major system issues or policy conflicts: Environment, Economic Competitiveness, Resilience, Transportation, and Regional Parks and Trails. Council staff offer the following advisory comments for your consideration:

**Environment** (*Jim Larsen, 651-602-1159*)

The City has submitted a draft Local Water Management Plan (LWMP) as a component of their Plan which is currently under 'formal' 45-day review by Council Water Resources staff. Comments will be sent in a separate letter to the City and Watershed following completion of that review.

If available at the time the City submits its formal Plan, we request the City provide the complete final LWMP in the document (as was done in this preliminary review submission with the draft LWMP), incorporating any recommended revisions from the Council and Watershed review of

the draft LWMP. If available at the time the formal Plan is submitted, we also request that the City provide to the Council the dates the Watershed approved the LWMP, and the date the City adopted the final LWMP.

**Solar Resource Protection** (Cameran Bailey, 651-602-1212)

The Plan is **complete** for Solar Resource Protection. Council staff offer this advisory comment for your consideration:

- For assistance with screening which roofs are feasible for solar photo-voltaic (PV) development in the community, Council staff highly recommend utilizing Google's "Project Sunroof" application. For the City of Jordan, the application states that there are approximately 1,500 roofs suitable for solar PV development in terms of the solar insolation potential.

**Transportation** (Russ Owen, 651-602-1724)

The Plan is **complete** for Transportation. Council staff offer the following advisory comments for your consideration:

- The first paragraph on page 3-33 (page 103 of the pdf) is not an accurate description of "public" transit. However, given that the section is labeled "Transit" rather than "Public Transit," it may be appropriate. Staff suggest the definition of transit be reconsidered.
- Consider dropping the second paragraph of the introduction on page 3-33, because it does not add information that is useful or addressed in the rest of the chapter.
- In the first paragraph of *I. Current Conditions* on page 3-33 delete "taxing" and replace it with "capital levy" to better reflect the actual name of the district.
- In the same paragraph, the Plan should reference the Transit Link dial-a-ride service provided within the City. City staff should consult with the Minnesota Valley Transit Authority (MVTA) and Scott County on the preferred way to discuss Transit Link services available in Jordan.
- The Plan should note that the closest transit service may be accessed at the Marshall Road Transit Station located at Hwy 169 & Marshall Road.
  - Consider adding that routes 490, 493, 495, 497 and 499 serve the station with service from 5:35 a.m. until 11:20 p.m. (depending on location served). Also, consider adding that service from the Marshall Road Transit Station includes express service to downtown Minneapolis, service to Burnsville and the Mall of America as well as various locations in Shakopee.
- Please note that the Blue Express service is provided by MVTA.
- Consider deleting the word, "are" in the first line of the last paragraph on page 3-35 (page 105 of the pdf).

The following sections of the draft Plan are considered **incomplete**. Changes in the draft Plan are definitely needed before the Plan is submitted to the Council for formal review.

**Forecasts** (Todd Graham, 651-602-1322)

The Plan is **incomplete** for sewer-serviced forecasts consistency and also forecasts allocation to Transportation Analysis Zones (TAZs). To be complete, the Plan needs to address the following items:

- In Chapter 4 (tables 4.1 and 4.4), the City describes its sewer-serviced forecast of households, population, and employment. The sewer-serviced employment forecast (3,250 jobs) is higher than the community total forecast (2,800 jobs) in Chapter 2. It is



unclear whether this is an error or an inconsistency, or if the City is serving commercial customers in the neighboring townships. To be complete, the City must resolve or explain this table.

- The Plan needs to assign 2020, 2030, and 2040 forecasts to transportation analysis zones (TAZs). The TAZ allocation in table 3.8 has 2040 totals that are significantly low, missing half of Jordan's employment, households, and population in both the base year and 2040. To be complete, the City should provide intermediate years (2020, 2030) forecast allocations and update the forecasts to reflect the correct and total allocation for employment, households, and population in all columns.

#### Advisory Comments

Staff offer the following advisory comments for your consideration to improve clarity and strengthen policy:

- The draft Plan includes the Metropolitan Council forecast for 2020, and revised forecasts for 2030 and 2040 (table 2.1). City and Metropolitan Council staff discussed the forecast revision in March-April 2018. Council staff find the forecast revision acceptable. The Metropolitan Council will officially revise the forecast effective with action on the final Plan. For reference:

	Census	Estimate	Previous Council Forecasts			Revised Council Forecasts		
	2010	2016	2020	2030	2040	2020	2030	2040
Population	5,470	6,213	6,900	8,300	9,900	6,900	9,600	12,200
Households	1,871	2,122	2,500	3,160	3,900	2,500	3,600	4,700
Employment	1,587	1,923	2,200	2,500	2,800	2,200	2,500	2,800

- Chapter 2 of the draft Plan describes land supply for future housing. In table 2.13, the City identifies "2016 available acres" and "2040 net new acres." Adding these columns together, the land supply includes 377 acres for low-density residential; 215 acres for medium-density residential; 2 acres for high-density residential. If all of this land supply is fully developed, at the mid-point of allowed density ranges, the land supply can accommodate over 4,000 additional housing units.
- The land supply meets the Metropolitan Council's expectation of guiding enough land to accommodate the growth forecast. Council staff note that the land guidance provides housing capacity substantially above and beyond the 2040 forecast; Council's forecasts assume that about one-third of this land supply will be developed and absorbed after 2040.
- Council staff note that table 2.9, identifying "net non-constrained acres," depicts a significantly smaller land supply. The City should clarify the meaning of this table, and/or verify the information provided.
- The land supply analysis in table 2.12 is confusing and contains calculation errors; the City should correct table 2.12.

#### **Housing** (Tara Beard, 651-602-1051)

The Plan is **incomplete** for Housing. To be complete for review, the Plan needs to address the following issues. Inconsistent items and advisory comments are also described below.

#### Incomplete Items

- Tools noted as an option to address housing needs must include what circumstances and when, if applicable, they would be used. Housing Bonds are a noted tool, but no

additional description as to when the City would consider its use is given. The Plan states that Scott County is the conduit for housing bonds, but cities can issue bonds as well, and this is not mentioned.

- Land guided to address the City's allocation of affordable housing need for 2021-2030 is not sufficiently described for review:
  - It unclear whether the development potential for affordable housing noted on p. 6-4 is anticipated between 2021 and 2030 or some other timeframe. The City's allocation is tied to forecasted growth for that decade, and land guided to address it must be anticipated to develop in that same decade.
  - Residential land uses described in Table 2-13 appear to indicate only 1 acre of High Density land and 1 acre of Mixed Use land would be needed for development in 2021-2030. This is inconsistent with Table 6-12 by a significant amount. Some sort of staging table indicating anticipated High Density Residential and Mixed Use development for the 2021-2030 decade should be described clearly and consistently in both the Land Use and Housing chapters.

#### Policy Inconsistencies

Some widely used tools to address housing needs aren't included. To be consistent, tools must be acknowledged, and the Plan should state if, and if so when and why, it would consider using them to address housing needs:

- Explore and advocate for a Community Land Trust to investigate the potential for affordable homeownership options
- City support/sponsorship of applications to Minnesota Housing's Consolidated RFP
- Site assembly
- A Fair Housing policy (note additional information about Fair Housing Policy in advisory comments)
- Tax Abatement
- Resources available through the City's EDA
- Preservation resources, especially with respect to existing manufactured housing

Furthermore, to be consistent, all housing tools described will be linked clearly and consistently to stated housing needs, including needs connected to various levels of affordability. For example, Livable Communities Act programs are described in support of affordable housing needs at 30% AMI or less, but not other levels of affordability.

Please note, forecast changes, discussed above, have increased Jordan's allocation of the region's need for affordable housing for the 2021-2030 decade. The Plan needs to acknowledge its updated allocation of 294 units (107 units at  $\leq 30\%$  AMI; 63 units at 31-50% AMI; 124 units at 51-80% AMI) and guide sufficient high density/mixed use residential land such that as many units could be built in the 2021-2030 decade.

#### Advisory Comments

- On page 6-15, the Plan indicates that land could be guided or zoned for senior housing. Council staff advise that it may not be legal to guide or zone land for a particular population. Council staff suggest consulting with the City attorney to evaluate that statement.
- On p. 6-18, the Plan states that the City would support/sponsor applications to Livable Communities Act programs. In reality, a participating city must be the direct applicant for those funds. Please clarify for what types of housing needs the City would consider applying for LCA funds.

- With respect to a Fair Housing policy, Local Fair Housing policies do not mean that City's should or can manage or administer Fair Housing complaints. A local fair housing policy rather ensures the City is aware of fair housing requirements with regard to housing decisions and provides sufficient resources to educate and refer residents who feel their fair housing rights have been violated (this can be as simple as having links to resources on the city's website). The Metropolitan Council will require a Local Fair Housing policy as a requirement to draw upon Livable Communities Act (LCA) awards beginning in 2019. To learn more, please refer to the following resources:
  - *Creating a Local Fair Housing Policy* webinar: <https://www.youtube.com/watch?v=38JY4pNGnZ8&feature=youtu.be>
  - Best practices: <https://metro council.org/Handbook/PlanIt/Files/Webinar-Fair-Housing-Handout2.aspx>
  - Policy template: <https://metro council.org/Handbook/Training/Webinars.aspx> - click on Handout 1 under the Implementing A Local Fair Housing Policy at the bottom of the screen.
- Council staff strongly encourage City staff to ensure the Plan addresses the important need to protect and support its Manufactured Home community. Rehabilitation resources, conversion to a co-operative (if not one already), local notice-of-sale, or first-look provisions could be considered.
- Council staff strongly encourage the City to consider an Accessory Dwelling Unit (ADU) policy. This is an effective way to diversify housing choices within existing single-family neighborhoods.
- All of the existing housing data (including the price of a home affordable to a household earning 80% AMI) sourced from the Metropolitan Council has been updated with 2016 data. Council staff recommend reviewing the updated Existing Housing Assessment on Jordan's community page in the Local Planning Handbook and updating any relevant data.

#### **Land Use** (*Jake Reilly, 651-602-1822*)

The plan is **incomplete** for land use. To be complete for review, the Plan needs to address the following issues:

- Maps throughout the Plan are difficult to read. Legibility of details and legends are difficult to verify as meeting minimum requirements.
- A Future Land Use table clearly calculating total acres and percent of total acres for each land use category in each 10-year planning period (2020, 2030, and 2040) must be clearly provided. While there is a great deal of interesting information shown in the Land Use Chapter tables, it's unclear how many acres for each land use category are available in each 10-year planning period. This is necessary for an appropriate land use and density analysis. The Plan does identify the land needed to accommodate forecasted growth, but it is less clear where or when that land is planned to develop or at which densities it is planned to develop. Please clarify, perhaps in tables 2-12 and 2-13. The land use analysis must be able to clearly show that the City's Plan meets the minimum average density 3-5 units per acre for Rural Center communities.
- In the Land Use section on pages 2-12 to 2-37 (pages 26 through 51 of the pdf), the Plan must include a definition of the expected share of individual land uses and permitted density ranges for residential uses in mixed-use districts. While there are density ranges listed in the Tables 2-8, 2-10, and 2-11, no expected share of uses is included for mixed-use districts. Please include a table of the expected share (such as 30% commercial, 40% office, 30% industrial) in one of those tables. Consider if Table 2-



10 might be the best fit. Tables 2-10 and 2-11 could be combined to accomplish this, if shares are added.

- In the Staged Development and Redevelopment section on pages 2-34 to 2-37 (pages 48 to 51 of the pdf), a table of staged development in 10-year increments including future land uses, area in acres, density ranges, and total residential units by each 10-year time increment must be included. This is not clearly depicted in any single table.
- Properties currently in the Metropolitan Agricultural Preserves Program are identified as Agricultural land use, as required by state statute. The land use description must also include a statement including a "maximum density of 1 unit per 40 acres" to ensure the properties enrolled meet the statutory requirement.

**Implementation** (Jake Reilly, 651-602-1822)

The plan is **incomplete** for implementation. To be complete for review, the Plan needs to address a defined timeline for when actions will be taken to implement each required element of the Plan, as well as a schedule for the preparation, adoption, and administration of needed changes to official controls.

In summary, the submitted draft Plan is missing a number of items and may require revision. If you have any questions or need further information regarding the comments in this letter, please contact Jake Reilly, Principal Reviewer at 651-602-1822, or Angela Torres, Sector Representative, at 651-602-1566.

Sincerely,

A handwritten signature in blue ink, appearing to read 'LisaBeth Barajas', with a long, sweeping horizontal flourish extending to the right.

LisaBeth Barajas, Director  
Community Development

CC: Deb Barber, Metropolitan Council District 4  
Angela Torres, Sector Representative  
Jake Reilly, Principal Reviewer  
Raya Esmaeili, Reviews Coordinator



# City of Jordan

## 2040 Comprehensive Plan Update

### Adjacent and Affected Jurisdiction Review and Comment Form

June 19, 2018

To: Sand Creek Twp., St. Lawrence Twp., Scott County, School District 717; Jordan,  
Scott County Watershed Management Organization, MnDOT, MnDNR

Per Minnesota Statute [473.858 Subd. 2](#) and the Metropolitan Council, we are distributing the proposed City of Jordan 2040 Comprehensive Plan Update for your review and comment.

The 2040 Comprehensive Plan Update can be found here:

<http://jordanmn.gov/notices/comprehensive-plan-2040/>

**On June 18 the Jordan City Council authorized distribution of the proposed 2040 Comprehensive Plan during their regularly scheduled meeting.**

It is respectfully requested that you review the proposed 2040 Comprehensive Plan Update and send any comments or indication of no comment to the City of Jordan, 210 East First Street, Jordan, MN 55352, Attn: Lucinda Meyers, by Wednesday, December 19, 2018. With regard to review of the Comprehensive Plan Update, we ask that you provide feedback as timely as possible within the requested 6-month comment period. Please be advised that email response is also acceptable and may be sent to [lmeyers@jordanmn.gov](mailto:lmeyers@jordanmn.gov).

In the event that there are questions regarding the Comprehensive Plan Update, or if additional information is needed, please contact Lucinda Meyers at [lmeyers@jordanmn.gov](mailto:lmeyers@jordanmn.gov) or 952-492-7940.

On behalf of the City of Jordan, we would like to thank you in advance for your assistance and prompt response.

Lucinda Meyers  
City Planner

Adjacent or Affected Jurisdiction Name: \_\_\_\_\_

Please check the appropriate box:

- ☐ We have reviewed the proposed Plan Update, do not have any comments, and are therefore waiving further review.
- ☐ We have reviewed the proposed Plan Update and offer the following comments (attach additional sheets if necessary)

The mission of the Minnesota Department of Natural Resources is to work with citizens to conserve and manage the state's natural resources, to provide outdoor recreation opportunities as well as for commercial uses of natural resources in a way that creates a sustainable quality of life. With these things in mind, we appreciate the opportunity to provide comments on the city of Jordan's draft 2040 comprehensive plan. We support that the city's "recognizes the importance of its natural resources" and became a GreenStep City

The following comments outline other ways to further these goals:

**Community Forestry.** The plan draft references the importance of tree canopy and the city's tree preservation ordinance. The potential for loss of tree canopy due to threats such as emerald ash borer and oak wilt can negatively affect health and environment, and a planned community forest can provide numerous community benefits. The first step to achieving a resilient community forest is conducting a tree inventory. The second step is developing a community forestry management plan that includes strategies for managing trees, especially ash, and encouraging a diverse tree canopy on private and public lands. It would be worth mentioning in the Comprehensive Plan if Jordan has an existing forestry plan as part of a strategy to meet environmental goals and policies. We recommend the City includes pursuit of Tree City USA status as part of its implementation plan.

**Ecological Resources.** The DNR supports including data from the Natural Heritage Information System (NHIS) in the Comprehensive Plan. We recommend that the plan include goals and strategies to address how rare species and plant communities will be protected. Two data layers useful for land use and conservation planning include the MBS Native Plant Communities and the MBS Sites of Biodiversity Significance. GIS shapefiles of these data layers can be downloaded from [the Minnesota Geospatial Commons](#). The DNR recommends avoidance of these ecologically significant areas, especially MBS Sites of Outstanding or High Biodiversity Significance and DNR Native Plant Communities with a conservation status rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable to extirpation). We recommend that Comprehensive plans include a map of both of these layers and a list of the types of native plant communities documented within the plan's boundaries.

For further conservation planning and to ensure compliance with the Minnesota endangered species laws, the DNR encourages communities to check the NHIS Rare Features Data for known occurrences of state-listed species. The NHIS Rare Features Data contains nonpublic data and can only be accessed by submitting a License Agreement Application Form for a GIS shapefile or by submitting a NHIS Data Request Form for a database printout. Both of these forms are available at [the NHIS webpage](#).

For more information on the biology, habitat use, and conservation measures of rare species, please visit [the DNR Rare Species Guide](#). NHIS training includes rules for using/displaying nonpublic data in public documents.



Links: MBS Sites of Biodiversity Significance

[http://www.dnr.state.mn.us/eco/mcbs/biodiversity\\_guidelines.html](http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html)

MBS Native Plant Communities

<http://www.dnr.state.mn.us/npc/index.html>

**Native Species.** Encourage private and public developments to be planted with native flowers, grasses, shrubs and tree species. Species such as monarchs rely on these plants, and it does not take many plants to attract butterflies, other beneficial pollinators as well as migrating and resident birds. Adding more native plants into landscaping, not only enhances the health and diversity of pollinators and wildlife populations, these plants can also help filter and store storm water, a strategy which would help to fulfill other goals in your plan. For more information consult DNR's [pollinator page](#).

Plant lists and suggestions for native plants can be incorporated into:

- Proposed landscape guidelines to improve the aesthetics in for commercial and industrial areas
- Street tree planting plans
- City gateway feature
- Along ponds and waterways.
- Small nature play areas in children's parks
- Along the edges of ballfield complexes.

**Development/Transportation and Wildlife.** In another measure to preserve the natural environment, consider adding policies that take wildlife into consideration as transportation and redevelopment projects occur. To enhance the health and diversity of wildlife populations, encourage developers of both private and public lands to retain or restore natural areas by planting them with native species. One larger area is better than several small "islands" or patches; and connectivity of habitat is important.

Animals such as frogs and turtles need to travel between wetlands and uplands throughout their life cycle. Consult [DNR's Best Practices for protection of species](#) and [Roadways and Turtles Flyer](#) for self-mitigating measures to incorporate into design and construction plans. Examples of more specific measures include:

- Preventing entrapment and death of small animals especially reptiles and amphibians, by specifying biodegradable erosion control netting ('bio-netting' or 'natural netting' types (category 3N or 4N)), and specifically not allow plastic mesh netting. (p. 25)
- Providing wider culverts or other passageways under paths, driveways and roads while still considering impacts to the floodplain.
- Including a passage bench under bridge water crossings. (p. 17) because typical bridge riprap can be a barrier to animal movement along streambanks.
- Curb and stormwater inlet designs that don't inadvertently direct small mammals and reptiles into the storm sewer. (p. 24). Installing "surmountable curbs" (Type D or S curbs) allows animals (e.g., turtles) to climb over and exit roadways. Traditional curbs/gutters tend to trap animals on the roadway. Another option is to install/create curb breaks every, say, 100 feet (especially important near wetlands).
- Using smart salting practices to reduce impacts to downstream mussel beds, as well as other species.
- Fencing could be installed near wetlands to help keep turtles off the road (fences that have a j-hook at each end are more effective than those that don't).

### Comments on Specific Components of the draft:

- P. 2-21. Because of the significant resources described in the plan, such as wetlands, waterways and bluffs, we recommend including these significant natural features as an underlay to the proposed land use map, similar to the layer of undevelopable land shown on the redevelopment map.
- P. 2-31 describes new residential policies. In addition to the commendable policies 2 through 4, we recommend adding language that encourages protection of grasslands and planting of native grasslands, as these are vital to supporting pollinators, birds and other wildlife. See below.
- P. 2-52 to 2-54. The city should consider adopting clear goals and policies to address the continued flooding the community is experiencing. We support policies to increase flood resiliency which would then be a foundation for initiatives such as adoption of higher standards in ordinances, preserving flood storage capacity, acquisitions of at-risk structures, permanently preserving key open spaces, and streambank restoration. This is of particular importance considering the city's growth, which means there exists the potential for continued alteration of hydrology.
- In Chapter 2 – F, consider adding an additional policy to buy out properties that frequently flood and replace them with green space/park. This would also contribute to the City's resiliency goals. Consider appropriate grant programs to assist such as: [https://www.dnr.state.mn.us/grants/water/flood\\_hazard.html](https://www.dnr.state.mn.us/grants/water/flood_hazard.html)
- Considering the extent of public water wetland 70-220W south of Hwy 169, and please add the public waters inventory layer to Map 2-10.
- On P. 2-49 -- According to MN Statutes, Sections 103F.101 to 103F.151 may be cited as the "Floodplain Management Law." Please change Flood Plain to "Floodplain." It would be more accurate to state that DNR is responsible for oversight, including approving ordinances before communities adopt them, etc. Communities are responsible for ordinance implementation at the local level. DNR is the coordinating agency and has oversight responsibilities but the Floodplain Management Law, Minn. Stat. 103F, is administered at the local level.
- Within Section D. Floodplains. The plan recaps the history of flooding, and indicates that nothing has yet been done to address the recurrent flooding. It would be appropriate to address and include what the City plans to do now and in the future, to reduce flooding problems as this Comprehensive Plan is intended to be a forward-looking document. Please revise the 2017 FIRM adoption to 2019.
- Section VI., Natural Resources Goals and Policies is very well done.
- For Map 4-8 (see attached marked-up map), consider indicating an alternative to single- and medium-density residential in the circled area. Residential development would not be allowed within the public water wetland located in this area.
- Page 4-46 Goal 3. It would be worth noting here that many of these efforts also serve the purpose of building resiliency to reduce flooding. For example, setting aside an area where

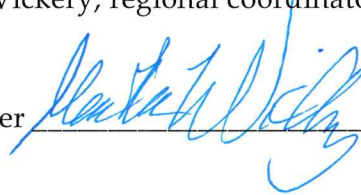
Sand Creek could access the floodplain can reduce erosion, decrease sediment transport and decrease flooding in other areas.

- Pg. 4-49. Policy 4.10: The policy states, "The City will not allow excavation, or other non-filling related alterations to an existing wetland without the expressed written approval of the City Administrator or designee." Please note that no filling within DNR public water wetlands is allowed for development. Other fill in public water wetlands, such as the large wetland south of 169 in Jordan, must be approved by the DNR. You may want to note the difference between WCA vs. DNR wetlands and regulatory roles.
- Pg. 7-4. You might consider adding the MN DNR as a partner for floodplain resources, such as the grant program for frequent flooding.

Reviewer: \_Martha Vickery, regional coordinator, Lands and Minerals Division, DNR\_\_\_\_

Date: \_\_12/14/18\_\_

Signature of Reviewer







**Scott Watershed Management Organization**

200 Fourth Avenue West

Shakopee, MN 55379-1220

952-496-8054 Fax 952-496-8496

[www.scottcountymn.gov/wmo](http://www.scottcountymn.gov/wmo)

August 14, 2018

Lucinda Meyers  
City of Jordan  
210 East First Street  
Jordan, MN 55352

Dear Ms. Meyers:

This letter presents the findings of the review of the City of Jordan's Local Water Management Plan, dated June 6, 2018. The documents were reviewed for equivalency with the Scott Watershed Management Organization Comprehensive Water Resources Management Plan in accordance with State Statute 103B and Minnesota Rules 8410.

The Scott WMO has received comments from the Metropolitan Council on the City of Jordan's Local Water Management Plan on August 3<sup>rd</sup> and has reviewed and considered those comments in our decision of the city's Plan meeting equivalency with the Scott WMO Watershed Management Organization Water Resources Plan.

Although staff feels the Plan is close to an approval, we have some comments and follow-up questions we would like a response to before we are ready to recommend its approval. Below please find our comments and questions for your consideration and response.

**City of Jordan Local Water Management Plan**

- 1.) We would like to note that after reviewing Met Council's comments, staff does not agree with comment #2. Scott WMO staff feels the city did include an adequate summary with the following information in their Plan including: Map 4-12 showing flow direction, proposed regional ponds & areas to be served by those ponds, local ponds, proposed pipes and channels along with 6. Existing Watersheds and Required Improvements on page 4-66 of the Plan.
- 2.) We would also like to note that after reviewing Met Council's comments, staff does not agree with comment #4 where Met Council states; *"The Plan needs to include the details on how wetlands functions and values will be classified, monumentation requirements, what is the period of inundation, what wetland function and value classification system should be used and setback requirements."* Neither Minnesota Statute 103B.235 Local Water Management Plans, nor Minnesota Rule 8410.0160 Local Water Plans requires this information in the local water plans. With that said, the Scott WMO will require

- equivalency of the City's ordinances with the Scott WMO Standard G - Wetland Buffer rule when we review your ordinances. That equivalency will require the city to demonstrate it is meeting the criteria set forth in those rules [2.Criteria, (a) through (o)].
- 3.) Page 4-50, Goal 6: Groundwater Management, 1<sup>st</sup> paragraph refers to the city of Elko New Market Wellhead Protection Plan, as well as the first sentence in the second paragraph. Staff is assuming this is a typo and should read city of Jordan Wellhead Protection Plan?
  - 4.) Page 4-54, Table 4-19, please reference the Map 4-12 somewhere in the discussion of the Stormwater Area Charge.
  - 5.) Page 4-55, VII. Implementation. Please describe how the City prioritizes city street sweeping and how frequently it's done. For example, what is the City's schedule for street sweeping; does the city sweep in the spring and fall? What areas do you prioritize for street sweeping in those seasons? Areas of the City that directly drain to Sand Creek or the Minnesota River, the roads where more sand is used, areas that drain to the Mill Pond?
  - 6.) Page 4-57, table of actions listed in order of priority. Consider giving this table a name, such as Table 4-20 (next in the series) with a title for easy reference.
  - 7.) Page 4-58, table of priority actions, third row under Funding Source column; states City of Elko New Market, should this be changed to City of Jordan? In addition in the same table, last row under Action column; change Sand Creek TMDL to Lower Minnesota River TMDL/WRAPS Study.
  - 8.) Page 4-58, Section VIII. Amendments to the Plan. The city indicates in this section- *"This Plan shall remain in effect for five years from its adoption by the Councilor until an amended Plan is adopted, not to exceed 10 years from the date of the initial adoption."* Is there something planned five years from now that the city plans on amending their Plan?
  - 9.) Page 4-65, 5. Pond Design Goals and Criteria, paragraph five, second sentence; *"The proposed detention/water quality ponds may be designed as non-uniform meandering waterways, creating a more natural appearance while maintaining the designing intent and providing cost savings by reducing the length of large diameter pipe."* Staff loves this idea!
  - 10.) Page 4-69, 7. Conclusions; The first sentence in this paragraph states that *"The City's existing storm sewer treatment and conveyance system cannot accommodate continued development in the regional growth boundary area."* The city might consider adding onto this statement with continuing to say, "without upgrades of existing infrastructure" or something of that nature. Staff's concern is that, a citizen who reads this, they may have an excuse to approach the city with a development moratorium request if any more development is proposed.
  - 11.) Page 4-69, 7. Conclusions, second paragraph; *"The regional and localized stormwater detention/water quality pond model presented in this Plan is one approach to accommodate the predicted urban development in the regional growth boundary area of the City."* The model is based on precipitation estimates from the Technical Paper 40 which is now generally considered dated, and not representative of more recent rainfall patterns. Staff suggests modifying the language in this paragraph to indicate the city will use the most recent information on rainfall estimates (i.e. Atlas 14) to ensure sizing of future development infrastructure and any needed upgrades to the existing infrastructure will not cause additional flooding issues. We're not suggesting the system modeling needs to be redone; just that rainfall information will be used for sizing infrastructure before it's built. Although, maybe the city should consider in the near future, updating



your model given the conclusion of the Plan that the system cannot accommodate continued development, as this was made based on older information and you've already indicated you know where the stress points are.

Thank you for the opportunity to review your Local Water Management Plan. If you have any questions regarding our comments, feel free to give me a call at 952-496-8887 or email [mbokman@co.scott.mn.us](mailto:mbokman@co.scott.mn.us).

Sincerely,



Melissa Bokman  
Sr. Water Resources Planner

Cc: Paul Nelson, Environmental Services Program Manager, Scott WMO Administrator

August 2, 2018

Mr. Paul Nelson, Administrator  
Scott County Watershed Management Organization  
200 4<sup>th</sup> Avenue W  
Shakopee, MN 55379

RE: City of Jordan Comprehensive Surface Water Management Plan 45-Day Review  
Metropolitan Council Review File 21990-1

Dear Mr. Nelson:

The Metropolitan Council (Council) has completed its 45-day review of the draft City of Jordan (City) Comprehensive Surface Water Management Plan (Plan), as required under Minnesota Statute 103B.235. The Council reviewed the Plan for consistency with Minnesota Rules Part 8410.0160 and our *2040 Water Resources Policy Plan* (Policy Plan).

The City has created a thorough design document for the future sizing and location of regional stormwater basins, which will be very important as the City grows. The Plan builds on the content from previous plans, including but not limited to detailed hydrologic models of the City as well as assessments of problem areas, and adds more about the City's local water goals and provides implementation components. Section 7 of the Plan outlines actions to be considered to resolve identified issues and lays out an array of water quantity and quality projects. The Plan clearly describes the responsibilities for the management and regulation of water resources. The water resources within the City are addressed, including information about impairments. Finally, the City lays out a clear process for amendments to be made to the plan.

There are a few areas of the Plan, however, that need to be strengthened. To be in full conformance with Minnesota Rules Part 8410.0160 and the Policy Plan, Council staff recommends the plan be updated to:

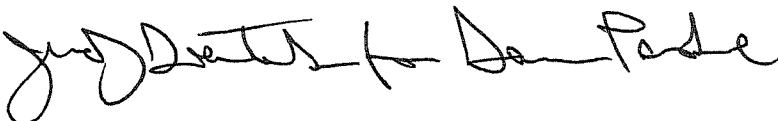
1. Include a summary of the appropriate water resources management-related agreements that have been entered into by the City. The Plan includes a subsection on page 4-42 to cover this topic, however it does not offer any specific agreements between the City and other municipalities. The fact that the City's groundwater protections are outlined in Elko New Market's Well Head Protection Plan is an example that should be included in this section. Additional agreements between the City and the MPCA regarding the TMDL for Sand Creek could also be included.
2. Include drainage areas, volumes, rates, and paths of stormwater runoff. The City identified that the extreme volume of data in the modeling files precludes the City from including this in the Plan. Council staff agree that the entire model is not necessary for inclusion, however a summary of the volumes and rates would be beneficial to improving the Plan.
3. Include more clarity in the description of the storm event analysis. In the process of analyzing the functionality of the existing pond and culvert system the City used "storm events less than or equal to the 100-year, 24-hour storm." Please state if the precipitation estimates were based on data from NOAA Atlas 14 or from another source.

4. The Plan indicates there are a number of wetlands within its geographic boundary and references the state Wetland rules and the County wetland rules. However, the city is proposing to be the responsible entity to administer the state wetland program. The Plan needs to include the details on how wetlands functions and values will be classified, monumentation requirements, what is the period of inundation, what wetland function and value classification system should be used and setback requirements.
5. Section 7, Implementation, needs to be improved in the following ways:
  - a. The City needs to commit to actions identified in the implementation program. The Plan indicates actions shown in the table on pg.4-57 and 4-58 are suggestions presented for the "City Council's consideration" but not a clear commitment to action. Instead these actions should be as complete and accurate as possible giving the timing of the Plan.
  - b. Each action in the implementation plan needs to have schedule, estimated cost, and funding source identified as specifically as possible. The Plan generally lays out potential funding sources for projects. Where possible, the funding sources need to be specified by project. Each project needs to have an estimated dollar amount associated with it, rather than a range.
  - c. The implementation program should include annual budget totals.
  - d. The implementation program should include years all the way through the year the local water plan extends, with specific actions scheduled for all years.
6. As a requirement of the Council's Minimum Requirements, the Plan must have a table describing the capital improvement program that sets forth by year, details of each contemplated capital improvement that includes the schedule, estimated cost, and funding source.

In addition to the above requirements that must be met, the Council recommends the City consider adopting MPCA Minimal Impact Design Standards (MIDS). MIDS mimics natural hydrology in order to reduce flooding, minimize pollutants entering our waterbodies, and recharge groundwater.

We appreciate your consideration of our comments as you move forward with approval of the Plan. Of particular note is 5b above, and we recommend this be enhanced with, at a minimum, a full schedule with implementation years before the plan is approved. If you have any questions about these comments, please contact Jen Kostrzewski, at 651-602-1078, or at [jennifer.kostrzewski@metc.state.mn.us](mailto:jennifer.kostrzewski@metc.state.mn.us).

Sincerely,



Sam Paske  
Assistant General Manager, Environmental Services Division

cc: Lucinda Meyers, City of Jordan  
Deb Barber, Metropolitan Council District 4  
Angela Torres, Metropolitan Council Sector Representative  
Raya Esmaeili, Metropolitan Council Referrals Coordinator  
Jen Kostrzewski, Water Resources Section

## Haila Maze

---

**From:** Lucinda Meyers <lmeyers@jordanmn.gov>  
**Sent:** Tuesday, July 10, 2018 3:17 PM  
**To:** Wiltgen, Jennifer (DOT)  
**Cc:** Sherman, Tod (DOT); Scheffing, Karen (DOT); Owen, Russell; Haila Maze; Mike Waltman; Thomas Nikunen  
**Subject:** RE: CPA18-051 Jordan 2040 Comprehensive Plan

Thanks for the quick response, Jen!

### Lucinda Meyers

Planner

City of Jordan

210 East First Street  
Jordan, MN 55352  
Phone (952) 492-7940  
[www.jordanmn.gov](http://www.jordanmn.gov)



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**From:** Wiltgen, Jennifer (DOT) <jennifer.wiltgen@state.mn.us>  
**Sent:** Tuesday, July 10, 2018 2:11 PM  
**To:** Lucinda Meyers <lmeyers@jordanmn.gov>  
**Cc:** Sherman, Tod (DOT) <tod.sherman@state.mn.us>; Scheffing, Karen (DOT) <karen.scheffing@state.mn.us>; Owen, Russell <Russell.Owen@metc.state.mn.us>  
**Subject:** CPA18-051 Jordan 2040 Comprehensive Plan

Good Afternoon,

Thank you for submitting the Jordan 2040 Comprehensive Plan for review. MnDOT has reviewed the plan and has no comments.

Please let me know if you have any questions.

Thanks,  
Jennifer

Jennifer Wiltgen, AICP  
Principal Planner  
MnDOT Metro District  
1500 W County Road B2  
Roseville, MN 55113  
651-234-7788  
[Jennifer.wiltgen@state.mn.us](mailto:Jennifer.wiltgen@state.mn.us)

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## SCOTT COUNTY COMMUNITY SERVICES Planning Department

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December 19, 2018

Lucinda Meyers  
Planner  
City of Jordan  
Jordan, MN 55352

RE: City of Jordan 2040 Comprehensive Plan

Dear Lucinda,

Thank you for the opportunity to review and comment on the *City of Jordan 2040 Comprehensive Plan*. Staff from Scott County's planning, zoning, highway, transit, parks and natural resources departments have completed a review of the city's draft plan and provide the following comments based on adopted 2030 and approved 2040 Scott County plans and policies. The County's land use philosophy promotes the majority of new growth in the County's seven cities and preserves urban expansion areas around the cities where municipal services are expected or planned. Our comments are provided below.

### **CHAPTER 2: LAND USE**

- Redevelopment/Infill Potential: County staff supports the City's objective to include redevelopment and infill strategies as a component to city's growth plans.
- Future Land Use: Preserving land in the unincorporated area for future development on municipal sewer and water is a key component of the County's growth management philosophy. When comparing the city's planned land use map and county's planned land use map, all properties shown on *Map 2-4 Future Land Use* for city land use guidance are encompassed within the County's 2040 planned land use map as "Urban Expansion" or "Urban Business Reserve". Most of the properties shown on *Map 2-5 Post 2040 Future Land Use* for city land use guidance are also designated on the County's map in the urban expansion or reserve categories.

### **CHAPTER 3: TRANSPORTATION**

- County staff will continue to work with the city to review and evaluate traffic impacts associated with the proposed Minnesota Renaissance Festival site southwest of Jordan.
- Please consider the following important highlights of the approved Scott County 2040 Transportation Plan:
  - A future functional classification system was prepared, identifying ultimate functional classifications of Scott County roadways at full-build out. This future classification will allow the County to implement long-range corridor studies and prevent short-term developments from impacting a roadway's end use (i.e., prevent direct accesses, implement access spacing guidelines, etc.).
  - Please match the County's future functional class designation of County Highway 8 as a future Principal Arterial.





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- Jurisdictional transfers, or turnbacks, are a crucial part of future roadway planning process. Please take note of what roadways in Scott County's 2040 Comprehensive Plan may be transferred from the County to the City of Jordan and make reference of these roadways in the Transportation Chapter.
  - Scott County currently has a policy of constructing bicycle and pedestrian facilities on both sides of county highways in urban areas. Please include this policy into the City's discussion of trails and sidewalks along roadways. See the Alternative Modes Goals, Policies, And Strategies section of Scott County's Transportation Chapter for more information.
  - Thank you for including information on county and regional transportation studies as part of the Transportation Chapter. Please include a summary of the 169 Mobility Study as part of this section.
- This information could be added to the Transportation chapter: *Besides the Land to Air 169 Connector, the closest regular scheduled public transit option at this time is located at the Marschall Road Transit Station (MRTS) in Shakopee located at 1615 Weston Court. At this time, Minnesota Valley Transit Authority (MVTA) operates Commuter service on Monday-Friday from 5:30AM-7:00PM, fixed route service to Burnsville Transit Station and the Mall of America 7 days a week from 5:30AM- 11:30PM, and a local circulator in Shakopee.*
  - On page 103 under current conditions, here is some suggested text:
    - Dial-a-Ride Service:** SmartLink is the mobility manager for Scott County and consists of four transit services:
      - Transit Link which is a contracted dial-a-ride service through the Metropolitan Council and is a shared-ride, reservation-only transit service. Fares are established by the region.
      - A supplemental volunteer driver program for trips that are denied on the Transit Link system. Volunteers drive their own vehicles and donate their time to provide transportation for residents that could not be scheduled on the bus systems.
      - A shared vehicle program which coordinates the use of a vehicle that allows multiple partners to use a small bus for a wide range of services and transportation options.
      - SmartLink coordinates non-emergency medical transportation to provide a means of getting patients to non-emergency medical service appointments.

**Land to Air:** A subsidiary of Jefferson Lines, operates an inter-city bus service from Mankato to downtown Minneapolis. The inter-city transit service is subsidized by a MnDOT 5311(f) grant, which is a funding source dedicated for inter-city transit options. Known as the "169 Connection" the inter-city bus service includes two round trips daily from Mankato to downtown Minneapolis with stops at MNSU-Mankato, Gustavus Adolphus College, St. Peter, Le Sueur, Belle Plaine, Jordan, and Shakopee. This service connects to Minnesota Valley Transit Authority Route 495 at Marschall Road Transit Station, which connects to transit options at Burnsville Transit Station and Mall of America. The connection in downtown Minneapolis is the Hawthorne Transportation Center where there are statewide and national inter-city transit options.



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### CHAPTER 4: WATER RESOURCES

- Ultimate Growth Boundary. Map 4-2 showing the "2040 Growth Boundary" and the "Ultimate Growth Boundary" is helpful in evaluating the boundary in the County's 2040 planned land use map between "Urban Expansion" and "Transition Area". All of the properties within the "Ultimate Growth Boundary" are included in the Transition Area, which is intended to limit rural residential development and preserve land for post-2040 development on municipal sewer and water.

### CHAPTER 5: PARKS & TRAILS

- Page 2-34 (48), 5-13 (202), 5-32 (221): Blakeley Bluffs Regional Park Reserve is known as: Blakeley Bluffs Park Reserve.
- Page 3-12(82), 3-36(106): A search corridor is a tricky resource to display. It is not intended to show a specific course – but rather a generalized route that connects features. The County has not master planned this route and would not want to imply that the route goes through any specific property. The County's approach to displaying these corridors has been to present them as a thick, transparent line, perhaps 3 or 4 times the thickness of what is presented here. Staff recommends a similar treatment in the city's plan.
- Page 5-13 (202): Both Blakeley Bluffs Park Reserve and Doyle-Kennefick Regional Park are planned facilities. It is important to clarify to residents that these facilities are not yet open to the public. Murphy's Landing is now known as The Landing.
- Page 5-22: County staff is willing to work with city staff when and if a development is ever proposed in Sand Creek or St Lawrence Township near a city park search area. The County provides incentives for developers who preserve public values - such as a future public park site – and dedicate land within a plat in exchange for additional density or development standard flexibility.
- Page 5-32 (221): Blakeley Bluffs Park Reserve is envisioned to be an approximately 2,440 acre park reserve.
- Page 5-35 (224): This map appears to show an older version of the trail with a northern alternative. The link to this master plan outlines the approved alignment. <https://www.scottcountymn.gov/DocumentCenter/View/1356/Spring-Lake-Regional-Trail-PDF>

### CHAPTER 7: RESILIENCE

- County staff applauds the City's decision to dedicate an entire chapter on Resilience and its recent designation as a GreenStep City. The County has partnered with the University of Minnesota's Resilient Communities Program in 2018/19, and if certain research projects this year can help advance the plan's goals and objectives on resiliency, county staff will reach out to city staff for potential collaboration and information-sharing.





## SCOTT COUNTY COMMUNITY SERVICES Planning Department

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### **CHAPTER 10: IMPLEMENTATION**

- County staff supports the City's objective of working with surrounding townships to develop or implement Orderly Annexation Agreements. The County is ready to assist the city and township on these important agreements.

We recognize the importance of planning for growth in Scott County. We also believe that the City and County share many of the same growth and development pressures. As Scott County finalizes its 2040 Comprehensive Plan, we look forward to working collaboratively with you to address these issues and work together toward our mutual visions and guiding principles.

If you have any questions about the County's review, please contact me at 952-496-8654 or [bdavis@co.scott.mn.us](mailto:bdavis@co.scott.mn.us).

Sincerely,



Brad Davis, AICP  
Planning Manager